

Lawrence S. Lustberg
Daniel J. McGrady
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Telephone: (973) 596-4500
Facsimile: (973) 596-0545

Daniel M. Petrocelli (admitted *pro hac vice*)
Brett J. Williamson (admitted *pro hac vice*)
Jeffrey A. Barker (admitted *pro hac vice*)
David S. Almeling (admitted *pro hac vice*)
O'MELVENY & MYERS LLP
Times Square Tower
7 Times Square
New York, New York 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061

*Attorneys for Plaintiffs Par Pharmaceutical,
Inc. and Par Sterile Products, LLC*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PAR PHARMACEUTICAL, INC. and
PAR STERILE PRODUCTS, LLC,

Plaintiffs,

v.

QUVA PHARMA, INC., STUART
HINCEN, PETER JENKINS, and
MIKE RUTKOWSKI,

Defendants.

Civil Action No. 3:17-cv-06115-MAS-
DEA

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

THIS MATTER having been brought before the Court by Plaintiffs Par
Sterile Pharmaceutical, Inc. and Par Sterile Products, LLC (collectively, "Par"), for

an evidentiary hearing and a preliminary injunction against Defendants QuVa Pharma, Inc., Stuart Hinchin, Peter Jenkins, and Mike Rutkowski (collectively, “Defendants”), and the Court having considered Plaintiffs’ Memorandum of Points and Authorities and having taken evidence on _____, 2017, and good cause having been shown;

IT IS on this ____ day of December, 2017;

ORDERED that Plaintiffs’ motion for preliminary injunction is hereby **GRANTED**, and it is further

ORDERED that Defendants, and all persons working in concert with them, are enjoined from selling or offering for sale any product that competes with a Par product and was developed and/or is manufactured using Par’s trade secrets, including the products Ephedrine, Epinephrine HCl, Ketamine, Methohexital, Neostigmine, Oxytocin, and Vasopressin, and it is further

ORDERED that Defendants, and all persons working in concert with them, including the improperly solicited employees, are enjoined from further work on those products, and it is further

ORDERED that Defendants, and all persons working in concert with them, are enjoined from further soliciting Plaintiffs’ employees, and it is further

ORDERED that Defendants, and all persons working in concert with them, are enjoined from any further use of Plaintiffs' confidential and trade secret documents and information.

Honorable Michael A. Shipp
United States District Judge